



Appendix I

Template for Responses/Comments to any written submission

Please return completed templates by **5PM EASTERN TIME FEBRUARY, 24th, 2023** to the Nunavut Planning Commission,
 by email at submissions@nunavut.ca, by fax at 867-979-3443, or by mail at Box 1797, Iqaluit, Nunavut X0A 0H0.

IDENTIFICATION	
Date	February 23, 2023
Your Name:	Susan Leech; Michael Ferguson; Richard Paton
Your Title/Position	Ecology Technical Lead; Director of Wildlife & Environment; Assistant Executive Director, Operations and Benefits
Your organization (if applicable):	Firelight Research Inc., QWB; QIA
Your Contact information (email, Tel, mail, or fax):	QIA Lead contact: Richard Paton; RPaton@qia.ca QWB Lead Contact: Michael Ferguson, MFerguson@niws.ca , phone: 613-407-1197

*Add enough rows and pages as needed

	NPC REGISTRY FILE #	SECTION OF THE SUBMISSION	YOUR RESPONSE/COMMENT
1	21-178E	Point 3 of the current submission regarding the statement that “the proposed boundary of the Limited Use Zone on Hall Peninsula is not well supported by scientific and IQ evidence.”	<p>As noted in our Technical Memo (21-169E), both QWB and QIA are strongly supportive of the areas that have been delineated as limited use for caribou, given that Inuit knowledge holders are the experts in the identification of areas that need to be protected to maintain caribou population cycles into the future. The QWB and QIA categorically disagree with DeBeers assertion, but we admit that we may not have adequately listed all of the supporting IQ and scientific evidence available on the Hall Peninsula caribou calving and post-calving area.</p> <p>In order to address potential concerns that could be raised by some proponents about our new or revised submissions to the NPC, our February 2023 joint submission reviewed a</p>



comprehensive database of both Inuit Qaujimagatuqangit and western science (see Tables 1a and 1b in the Technical Memo and the appended reference list) to show the substantial lines of evidence for each of the new or revised areas delineated in our submissions.

Because the calving/post-calving area that overlaps with the Chidliak leases was already accepted in the 2021 DNLUP, supporting evidence that corroborates the identification of this area as limited use for calving/post-calving habitat was not detailed in our 21-173E submission. Given DeBeers' statements, which we find misleading, we will list additional corroborating IQ and scientific evidence below for the Hall Peninsula calving and post-calving area:

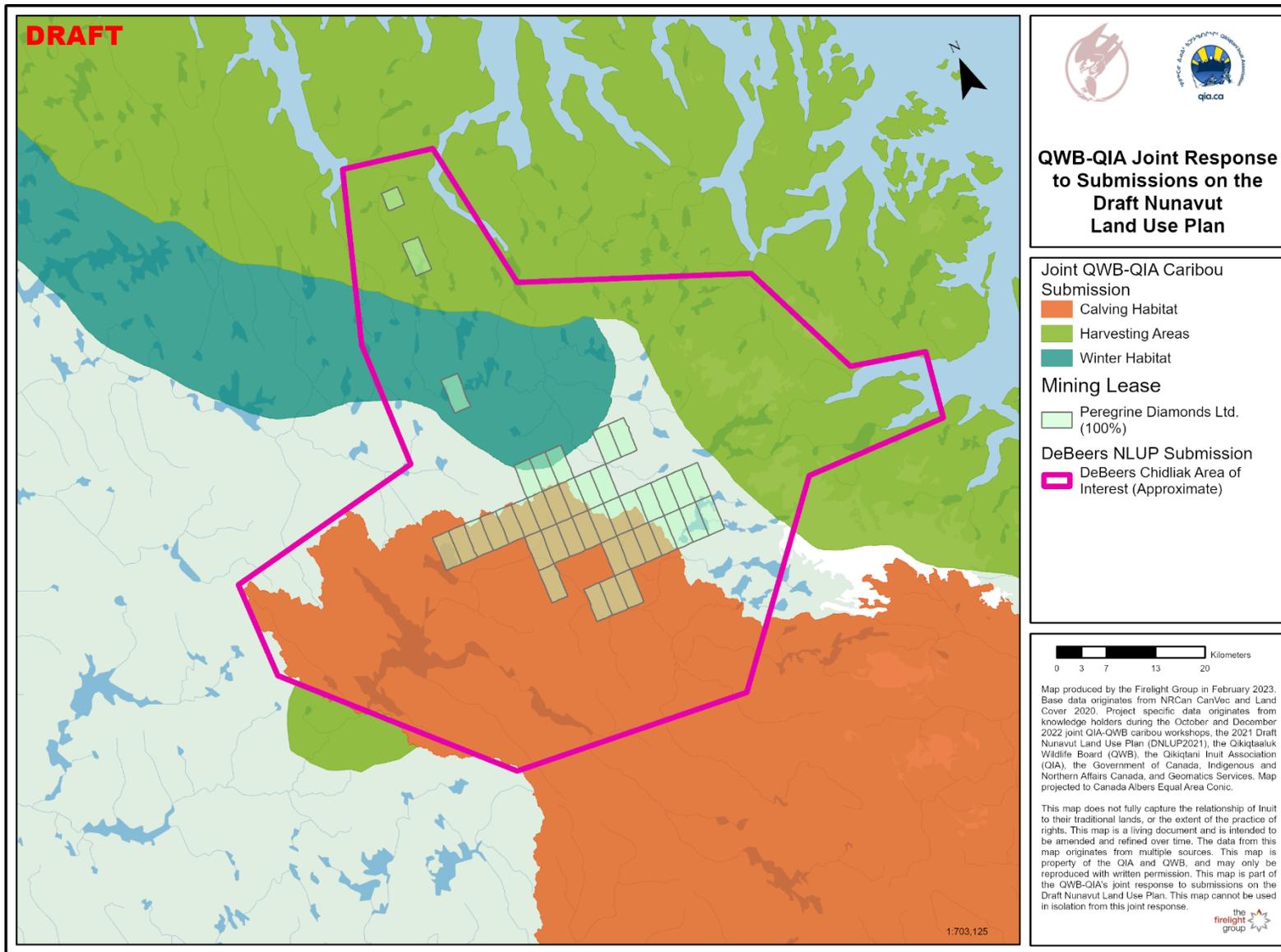
- Delineation by knowledge holders during the 2018 QWB workshop with the Amaruq HTO in Iqaluit, full support of the Board of the Amaruq HTO and the QWB AGM in 2018, followed by the QWB subsequent submission process to the NPC in 2018.
- Confirmation of the delineated calving and post-calving distributions again by Inuit knowledge holders and HTO representatives from Iqaluit and Pangnirtung, as well as caribou winter areas and Inuit harvesting areas, during two joint QIA-QWB workshops in October and December 2022.
- Overlaps with historical IQ from 1920 to 1993 (Ferguson et al 1998 Arctic 51: 201–219).
- Overlaps with scientific telemetry data of calving and post-calving seasonal distributions of caribou during the period of 1987-1995, which was used directly to help refine the boundaries of this specific area (Government of Nunavut unpublished data).
- Overlaps with observed caribou in composition surveys during 2015-2022 (Government of Nunavut unpublished data)..
- Overlaps with calving areas from Chowns and Popko, 1979, and calving areas identified by Elliott and Elliott, 1974 as cited in Chowns and Popko 1979.
- Overlaps with the calving and post-calving kernel density estimates (Campbell et al., 2015).
- Overlaps with calving areas identified during a Hall Peninsula survey conducted by the Government of the NWT (now Nunavut) in June 1982 (Michael Ferguson pers comm, unpublished data).

We welcome the opportunity to review this corroborating evidence with DeBeers and NPC if further information is required, bearing in mind that the weight of evidence from historical IQ

			during 1920-1993, the delineation of this area by Inuit IQ holders in 2018, and the confirmation of this area through repeated review by Inuit IQ holders in October 2022, December 2022 and a final verification in January 2023, is sufficiently robust to ensure that the existing boundaries are maintained in the final Nunavut Land Use Plan. Scientific evidence supporting the delineated calving and post-calving area includes multiple aerial surveys and telemetry studies over a 48 year period (1974 – 2022).
2	21-178E	Point 7 of the current submission, regarding DeBeers' recommendation to adjust the boundaries of the Limited Use designation to exclude both existing rights areas and areas of associated potential surface infrastructure, as well as a buffer zone around the area of geological interest.	<p>In response to this recommendation, we attach a map in Appendix 1 that shows the approximate location of the proposed “area of interest” (note that this area was approximated from the map included in Figure 1 of 21-178E). The AOI proposed by DeBeers overlaps with the caribou calving / post-calving area already identified in the 2021 DNLUP, along with an identified community area of interest for caribou harvesting (polygon 52 from QWB-QIA submission 21-170E) and a winter habitat area (polygon 86 from QWB-QIA submission 21-172E). Both of these polygons are supported by additional evidence in each of the respective submissions noted above.</p> <p>Given the importance of this area on the Hall Peninsula both for critical caribou seasonal habitat and the practice of Inuit rights, QWB and QIA do not support the exclusion of the area of interest and potential linear corridors shown on Figure 1 from the Limited Use designations. Inuit have clearly expressed that much of this area should be off limits to development.</p> <p>DeBeers has not established or justified having existing rights in the majority of their mapped AOI. On the other hand, the Inuit of Iqaluit and Pangnirtung have demonstrated generations of reliance on the area for their own exploration and production of food and other resources in most of the area, as shown in the QWB-QIA submissions.</p> <p>While DeBeers has expressed concern about the infrastructure needed to support their “existing rights” (i.e., the leases shown in the map in Appendix 1 and on Figure 1 of DeBeers' submission), it would appear that access to this area is possible without entering the areas designated as Limited Use for calving, Inuit harvesting areas and caribou winter areas. The NPC has been clear about grandfathering in areas with “existing rights” as described in the 2021 DNLUP Section 6.1.8, but we argue that at least equal consideration should be given to the existing rights of Inuit in these areas (see QWB's submission on Inuit harvesting areas; 21-174E). DeBeers would have access to the leases via mixed use areas</p>

			<p>to the east and north of their leases, continuing around the Hall Peninsula calving and post-calving area into Iqaluit. Access to DeBeers existing leases with existing rights is not prevented by the boundaries of this calving and post-calving area, in our opinion.</p> <p>Regarding DeBeers' statement that they see the Chidliak Project as being "compatible with caribou, during all seasons of the year and all stages of the caribou life cycle," this statement does not align with the Inuit Qaujimagatuqangit shared by Inuit during the development of the QWB-QIA joint submission. In particular, based on IQ, putting a road through caribou calving habitat and establishing transmission lines are in direct conflict with ensuring compatibility of the area for caribou during the calving season, as well as with the Inuit harvesting to the north. Our above conclusion is also supported by the multiple types of scientific evidence described above.</p> <p>Furthermore, the submission directly contradicts De Beers Canada's 2008 Statement on Caribou Conservation (Appendix 2). This statement, appended to a letter from De Beers Canada to WWF President Emeritus Monte Hummel, acknowledges "the cultural significance of caribou to Aboriginal peoples and the unique characteristics of each herd" and states that "De Beers does not conduct activities in caribou calving areas." We are left wondering why De Beers has apparently abandoned this important commitment made in 2008, particularly since Inuit in the Qikiqtani region have identified that these areas must be off-limits to all development, and that mobile protection measures, while potentially useful in some areas, will not sufficiently protect use of these areas by caribou, particularly during the low population cycle.</p>
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Appendix 1: Map showing location of De Beers' proposed Area of Interest around their Chidliak leases, as delineated in Figure 1 of 21-178E



Appendix 2: Copy of De Beers Canada 2008 Letter to WWF and Caribou Conservation Statement



October 24, 2008

Monte Hummel
President Emeritus
World Wildlife Fund
245 Eglinton Ave. East
Suite 410
Toronto, ON
M4P 3J1

Dear Mr. Hummel:

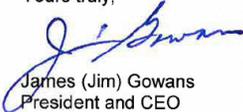
Thank you very much for your support of De Beers' initiatives in environmental sustainability. I very much look forward to our continued dialogue on land use planning with regard to the reform of the *Ontario Mining Act*.

In light of your recent launch of *Caribou and the North*, I would like to share with you one of De Beers' perspectives on conservation that relates directly to caribou. As you know we have progressive policies on the environment, sustainability and working with aboriginal peoples amongst others. These policies are reflected in the design of our exploration programs and the building of our mines.

De Beers Canada is pleased to work with the federal, provincial and territorial governments on caribou monitoring. We acknowledge the spiritual and cultural relationship that caribou have with Aboriginal peoples. To that end, our planning, mitigation and monitoring programs incorporate both traditional knowledge and western science in partnerships with Aboriginal communities.

I wish you the best of luck with the success of your new book.

Yours truly,


James (Jim) Gowans
President and CEO



cc. Justina Ray

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De Beers Canada Statement on Caribou Conservation

De Beers Canada seeks to be the leader in the diamond industry in environmental excellence.

Through our policies on the environment and working with Aboriginal peoples we seek to minimize the impact of our activities and create sustainable development benefits in those areas where we work.

De Beers Canada acknowledges the cultural significance of caribou to Aboriginal peoples and the unique characteristics of each herd.

De Beers does not conduct activities in caribou calving areas.

De Beers Canada's monitoring and environmental assessments incorporate both traditional ecological knowledge and western science.

Through our commitment to caribou conservation, De Beers Canada has developed appropriate management practices near calving and post-calving areas.

Through existing partnerships with Aboriginal, provincial and territorial governments and other experts, De Beers Canada will continue its support to monitoring of these areas.

In striving for environmental excellence, De Beers Canada is committed to continual improvement in its research and monitoring of caribou that exceeds regulatory requirements regarding caribou conservation, for example the Caribou Protection Measures, in the NWT and Nunavut.

De Beers Canada is committed to working with the World Wildlife Fund to protect caribou in Canada.



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Nunavut Planning Commission
Commission d'Aménagement du Nunavut